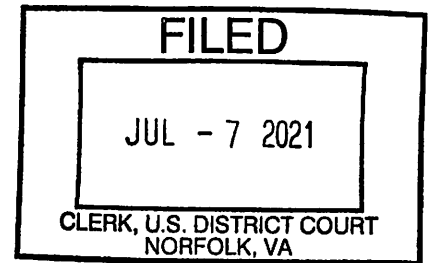


Lisa Renia Cypress, *Pro Se*  
2945 Da Vinci Blvd  
Decatur, Georgia, 30034  
Telephone:  
Email: lrcypress@gmail.com



**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**

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LISA RENIA CYPRESS

Civil Action No.: 2:21cv373

Plaintiff,

- against -

PNC BANK, N.A.,  
NORTHAMPTON COUNTY BOARD  
OF SUPERVISORS

Defendants

**DEMAND FOR JURY TRIAL**

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**COMPLAINT FOR EJECTMENT PURSUANT TO VIRGINIA CODE  
SECTION 8.01-131**

I, Lisa Renia Cypress, state as follows for my Complaint against Defendants PNC BANK, National Association ("PNC") and the Northampton County Board of Supervisors ("Supervisors"):

**Preliminary Statement**

1. This is an action for ejectment pursuant to Virginia Code Section 8.01-131, arising from the June 12, 1815 Settlement Agreement with the

Gingaskin Indians pursuant to an Act of the Legislature of this State entitled an Act authorizing “*a Division of the Land of the Gingaskin Tribe of Indians.*” The aforementioned Settlement Agreement further states: “*We the Subscribers, Commissioners appointed by the act of aforesaid, have met, at different times on said land made enquiry, and examination, of the Titles of said Indians, their numbers, families, and connections, and upon due consideration thereof, have determined that the said Land ought to be divided among those of the Tribe who are now of proper age...we have therefore directed the surveyor of this County to divide the said Land among the following persons, to wit, Edmund Press, Thomas Baker, Betsy Baker, wife of said Thomas, James West, Rachel West, Molly West, Nancy Carter, John Carter, Sophia Jeffery, Stephen Jeffery, Peggy Bingham, Susan Beavans, William West, Betsy Collins...William Drighouse, Thomas Jeffery, William House, Betty Drighouse, Ann Drighouse, Molly Beavans, John Bingham, Molly Press, Tabby Francis, Littleton Jeffery, Solomon Jeffery, and Ebby Francis...*”

2. The plots belonging to Molly West, William West, and Ebby Press are subject to this action because Defendant PNC unlawfully possesses the plot that belongs to Molly West and William West and Defendant Supervisors unlawfully possess the plot that belongs to Ebby Francis. I am a direct blood heir to Molly West, William West, and Ebby Francis.

3. **GENEALOGICAL BREAKDOWN**

- Edmund Press, born 1750; married Rachel West born 1735

- Issue: Susanna Press born 1795
  - Susanna House (Press), born 1795; married William House
- Issue: William House II born 1810
  - ✧ William House II born 1810 married Ebby Francis born 1805
- Issue: George House born 1832
  - ✧ George House born 1832 married Mary Sample born 1807
- Issue: Samuel House born 1893
  - ✧ Samuel House born 1893 married Annie Parramour 1885-1935
- Issue: Roger House born 1908
  - ✧ Roger House born 1908-1975 married Virginia Mae Bagwell born 1907-1994
- Issue: Virginia Mae House born 1932
  - ✧ Virginia Mae House born 1932 married Henry D. Cypress Jr born 1927-2017
- Issue: Lisa Renia Cypress

(True copies of death certificates, marriage certificates, census records, and other genealogical records are annexed herein as Exhibit A).

4. In addition to the aforementioned 1815 Settlement Agreement with the Gingaskin Indians, a document which vests title in me as a direct blood heir, on May 26, 2021, I updated said Settlement Agreement by recording a Deed supported by a Declaration.

5. The ejectment cause of action exists “to determine title and right of

possession of real property” within one suit. *Brown v. Haley*, 233 Va. 210, 216, 355 S.E.2d 563, 567 (1987). “The action is concerned only with the ownership rights of the plaintiff, and the proof necessary to support the action consists of the documents which vests title in the owner and any other evidence related to the issue of title.” *Id.*

6. The plaintiff in an ejectment action “has the burden of proving that he has good title and the right to possession, and must recover upon the strength of his own title rather than upon the weakness of the defendant’s title.”

*Providence Props., Inc. v. United Virginia Bank/Seaboard Nat’l, Trustee*, 251 S.E.2d 474, 479 (Va. 1979)

7. In addition, this ejectment cause of action exists to correct the wrongs such as Virginia State Eugenics policies and racist genocidal mandates created by Virginia State agents such as Walter Ashby Plecker. These wrongs caused forced many of my ancestors out of Virginia and into Northern States, seeking to leave the racist environment that Walter Ashby Plecker promoted.

8. Since about 1973, PNC has been unlawfully possessing the area of land that was given to my ancestors Molly and William West, pursuant to the aforementioned 1815 Settlement Agreement.

9. The Defendant, Supervisors, have been unlawfully claiming ownership since 1900 on the area of land that was given to my ancestor Ebby Press, pursuant to the aforementioned 1815 Settlement Agreement.

10. Accordingly, I bring this action to finally and conclusively obtain

possession of the lands that I have vested ownership and title by being a direct blood heir of the original owners listed in the aforementioned 1815 Settlement Agreement. In addition, I bring this action to recover damages caused by the Defendants combined 170 plus years of unlawfully possessing and financially benefitting off of my lands.

### **JURISDICTION AND VENUE**

11. Personal jurisdiction over the Defendants is appropriate because they claim a legal interest in the Virginia real property that is the subject of this action.

12. This Court has diversity jurisdiction of this matter under 28 U.S.C. §1332 because this is a civil action between citizens of different states and the amount in controversy is greater than \$75,000.

13. Venue is proper in this Court because the real property at issue is situated within this District, in Northampton County, Virginia.

### **Parties**

14. Plaintiff, Lisa Renia Cypress (hereinafter “Plaintiff”), is a citizen of the United States and a resident of Decatur Georgia.

15. Defendant PNC is a national banking association that is part of The PNC Financial Services Group, Inc., and is headquartered in Pittsburgh Pennsylvania.

16. Defendant Northampton County Board of Supervisors is an administrative agency of the government of the Commonwealth of Virginia located in Northampton County, Virginia.

### **STATEMENT OF FACTS**

17. This action concerns real property, located within Northampton County, Virginia, that had been settled pursuant to an agreement on June 12, 1815. The description of the land pursuant to said Settlement Agreement is as follows:

*“...The survey of the Land, and division thereof, we annex to this Report and do make partition of said Land according with said survey and we the said commissioners, by the authority vested in us by said Law, have also laid off the public Roads through the said Lands, in manner following, to wit; the Road from the Sea-Side, to commence at the Indian Town landing, and run on the high ground, continuous to the marsh, to the division line between Edmund Press and Thomas Baker; thence along the said line to the end of Edmund Press’s Lot; thence along the line between Tabby Francis and Thomas Baker, to the End of Tabby Francis’s Lot; thence along the line of Thomas Baker, Solomon Jeffery and Litt Jeffery on the one side, and Molly Press, John Bingham, Molly Beavans, and Ann Drighouse on the other side, to the line of the Land lately Robert Roger’s; thence along the line of said Roger’s Land to the corner Trees; From said corner Tree in a direct line, commencing as the Road now runs from said corner Tree,*

*straight to the Sea-Side where this Road intersects the said Sea-Side Road direct to the western line of the said Indian's Land, to this place, or point, where the Road leading from the courthouse intersects said western line. The Sea-Side County Road through said Land, to commence at the line of the Land lately Matthew Harmonsons, and run along the ditch now cut to the line separating said Indian's Land, from the Land of Nathaniel Holland..."*

18. The areas of land that are the object of this action are the lands originally given to Molly and William West and Ebby Press.

19. On or about June 1, 1973, PNC Bank, National Association claimed ownership of the land that covers the Molly and William West plots (A true copy of the aforementioned claim is annexed herein as Exhibit B).

20. On or about January 1, 1900, Northampton County Board of Supervisors claimed ownership of the land that covers the Ebby Press plot (A true copy of the aforementioned claim is annexed herein as Exhibit C).

21. On March 2, 2021, my sister purchased an official copy of the aforementioned June 12, 1815 Settlement Agreement from the Library of Virginia, which was subsequently recorded in the Northampton County land records on May 26, 2021 (A true copy of said Settlement Agreement is annexed herein as Exhibit D).

22. On May 26, 2021, I updated the aforementioned June 12, 1815 Settlement Agreement by executing and recording a Deed in the Northampton

County Land and Deed records office (A certified copy of said Deed is annexed herein as Exhibit E).

### **COUNT I – EJECTMENT**

23. The foregoing paragraphs of the Complaint are incorporated by reference as if fully set forth herein.

24. This count is a cause of action for ejectment, brought pursuant to Virginia Code Section 8.01-131, *et seq.*

25. I, Lisa Renia Cypress, am the fee simple owner of the lands that are subject of this action and hold legal title to said subject lands pursuant to the recorded Deed.

26. I have a right to possession of the subject lands as the current owner.

27. Defendants are in unlawful possession of my lands.

28. Defendant PCN Bank has generated hundreds of millions of dollars during its unlawful possession of my lands.

29. Defendant, Supervisors acted with willful intent since it unlawfully claimed ownership of my property.

30. I am asking this Honorable Court to declare and confirm my right to possess my ancestral lands.

31. The actions of the Defendants described herein have caused great injury to me by, among other things, preventing me from receiving an inheritance of these lands from my ancestors and preventing me from



benefitting from the economic opportunities that would have provided financial stability and security to me and my children and grandchildren.

32. The actions of the Defendants described herein have also caused injury to me because I would have been liable for carrying costs in connection with my ownership, such as for taxes and insurance, yet I've been deprived of all the rights that normally accompany ownership.

33. In addition to my damages, I am entitled to a judgment confirming my good title and right to possession of the subject property pursuant to Virginia Code 8.01-131, *et seq.*

#### **PRAYER FOR RELIEF**

34. **WHEREFORE**, Plaintiff prays for relief as follows:

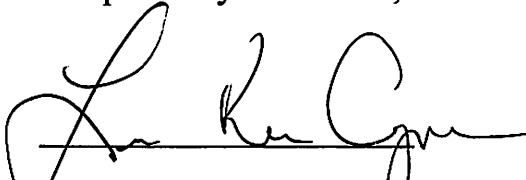
An award in favor of Plaintiff against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' unlawful possession of my lands in an exact amount that exceeds over \$75,000 dollars and to be determined at trial, including:

(a) Respectfully request that this Honorable Court establish and confirm my title to the subject lands as set forth in the Deed;

(b) Grant Plaintiff any further relief that this Honorable Court deems appropriate.

Dated: 7/7, 2021

Respectfully submitted,



Lisa Renia Cypress, *Pro Se*